

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE:

SUBJECT:

SAAD Company

FROM:

Director  
A&WMD

TO:

Al Smith, Chief  
Environmental Emergency Branch

Following is a summary of facts provided by Barry Sulkin, engineer with the Tennessee Water Pollution Control group (telephone 741-2275 or 2281).

1. The State has definitive information documenting chemicals being disposed of by this company at at least three sites. There are samples from a holding pond near a sinkhole at the site near the airport. This particular sinkhole was split by the L&N Railroad right-of-way. Historically, the sinkhole was used to dispose of waste oils and mixed chemicals by both L&N on one side and by SAAD Company on the other. Apparently this area is underlain by large, open channels that are documented in the geology of the area.

Immediately adjacent to this particular site, Dupont Company had a rather large phosphate mine, now filled in. Running off of this mine during the actual mining operation were many natural caves. It is the State's feeling that this cave system contains millions of gallons of mixed chemicals disposed of by SAAD over a number of years. There is evidence that these materials are being discharged onto a piece of adjacent property <sup>via</sup> in a spring which breaks out of bedrock. Two to three years ago, approximately 40 cows drinking from this spring were killed; the L&N Railroad paid damages.

There is no evidence on-site that a continuing discharge occurs from the SAAD property. A building has been constructed on the previous holding pond which apparently belonged to an adjacent property owner during its period of operation. A considerable amount of gravel has been deposited on the SAAD property itself, covering over the original ground surface, reportedly after free liquids and sludge were removed. The SAAD property is relatively small, containing an outbuilding with a garage, office structure, small laboratory, and a tank farm in the rear. It is probable that this site would meet basic SPCC requirements *except the Carbon tank is open on one end.* Approximately fifty drums of sludges that were removed from the ground on the site are being stored on the site.

Present use of the site appears to be to transfer waste oils from SAAD tank trucks to a large M&M recycling tank truck. Reportedly, the tanks on the site are full of contaminated runoff removed from a small oil-water separator.

The company appears to be operating in violation of an existing State court order relative to the operation of tank trucks on this piece of property without any corrective action being taken. They are also operating in violation of a State court order that requires them to conduct cleanup of various types at the three sites they have used.

The company has placed approximately 750,000 gallons of mixed chemicals and waste oil in a one million gallon tank belonging to the Smyrna Airport Authority. The tanks were originally being leased by SAAD.

In the town of Silver Springs, south of Smyrna, Tennessee, they operated a disposal operation on land that he proposed to purchase but he never did

(only placing anything except place a deposit). The land subsequently was recovered by the owners. In this operation he disposed of a variety of materials at various sites in the woods, most of which were cleaned up under court order. There was also a sinkhole on this site<sup>h</sup> to which materials were disposed of. The assumption is that they are still in the hole and progressing outward. Approximately thirty private home wells were contaminated by this operation. They have subsequently been placed on municipal water as a result of a HUD/<sup>FHA</sup> grant. Two homes may still be using the water by choice.

The State's continuing principal interest is with the site near the Nashville airport. The discharge to <sup>2</sup>the stream<sup>flowing through</sup> on approximately 300 acres of adjacent private property represents a potentially significant problem in the future as the land is being donated to the local museum to be used as a children's park. There is concern about exposure of the children to the chemical contamination, as well as concern that the continuing operation by SAAD could result in further contamination.

Although there have been a variety of State actions, none of them have eliminated the problem nor do they purport to provide an adequate solution to past contamination. The State is interested in any alternatives that the Federal government can recommend, both as to prosecution and cleanup.

2. The State has a lab book full of sample analyses identifying chemicals in addition to waste oil, the samples having been obtained from the various sites.
3. The State has extensive subsurface geological data available. Geological Survey has come in and reviewed this situation and indicated that they would be willing to place wells on the proposed park property and pay

fifty percent of the cost if someone else will pay the other fifty percent (Could Superfund consider participating in this as a study phase?).

4. As part of the record from a State Court action there is testimony from SAAD's drivers that they picked up and hauled chemicals and disposed of them in the sinkhole on the ground at ~~at least~~ the two locations. Analyses has found carbon tetrachloride, benzene, a variety of chlorinated organics, etc.
5. The State does have a record of many generators who used his firm to haul wastes but the record is incomplete. They have accessed, under court order, and reviewed SAAD's records but they are also quite incomplete.
6. The site in Silver Springs is adjacent to the property purchased by the Nissan Corporation. They have put wells on the site to document background contamination before they commence <sup>operation</sup> ~~construction~~ of their assembly plant.
7. Attached is a <sup>note</sup> chronology starting in June of 1968 that lists some of the high points through November 13, 1979, ~~taken by the State.~~ The State Attorney General's office does not appear to be pursuing any actions at this time, although the State Health Department would like them to. Accompanying me on the visit were two representatives from the Governor's Safe Growth Policy Task Force. They are interested in pursuing this issue further and requested a meeting with Barry Sulkin to go through a detailed chronology of actions to date. Mike Brunner has requested that we have someone from our program review these facts to determine what actions are available to EPA. Requested representation Monday or Tuesday of next week.

Thomas W. Devine  
c: Mike Newton